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March 2, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington DC 20554

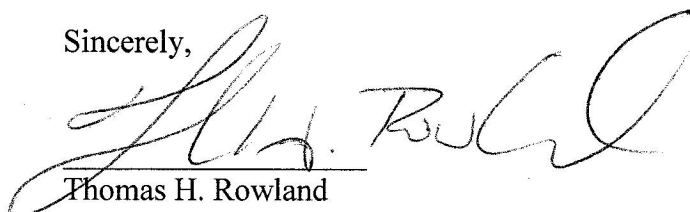
Re: WC Dockets 09-197 and 11-42 – Compliance Plan of Millennium 2000, Inc.

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission Order *In the Matter of Lifeline and Link Up Reform and Modernization* released February 6, 2012, attached please find the Compliance Plan of Millennium 2000, Inc. to be filed in WC Dockets Nos. 09-197 and 11-42.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Thomas H. Rowland

Thomas H. Rowland
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**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of the)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	WC Docket No. 11-42
Forbearance from 47 U.S.C. § 214(e)(1)(A))	
)	

COMPLIANCE PLAN OF MILLENNIUM 2000, INC.

On April 15, 2011 Millennium 2000, Inc. (“Millennium 2000”) filed a Petition seeking forbearance from Section 214(e)(1)(A) of the Communications Act of 1934, as amended (“Act”), and Sections 54.201 (d)(1) and 54.201(i) of the Commission's rules, which require a common carrier designated as an eligible telecommunications carrier (“ETC”) to offer services supported by the universal service fund (“USF”) over its own facilities or a combination of its own facilities and the resale of another carrier's services.¹ On February 6, 2012, the FCC released an Order containing updated policies and rules concerning, in part, the provision of Lifeline only eligible telecommunications carrier (“ETC”) services.² As part of that Order, the Commission granted Millennium 2000 “forbearance from the facilities requirement of section 214(e)(1)(A) of the Act and section 54.201(d)(1), (i) of the Commission’s rules, subject to the conditions contained in this Order.”³ The Commission further stated:

¹ *In the Matter of Telecommunications Carriers Eligible for Universal Service Support; Federal-State Joint Board on Universal Service; Millennium 2000 Inc. Petition for Forbearance*, WC Docket 09-197, CC Docket No. 96-45 (Filed April 15, 2011, Marked “Received and Inspected” on April 19, 2011).

² *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training*, Report and Order and Further Notice of Proposed Rulemaking (February 6, 2012) (“*Lifeline and Link Up Reform and Modernization Order*”)

³ *Id.* at fn. 982.

all three prongs of section (10)(a) are satisfied and that, as a result, the Commission will forbear from the “own-facilities” requirement contained in section 214(e)(1)(A) for carriers that are, or seek to become, Lifeline-only ETCs, subject to the following conditions: (1) the carrier must comply with certain 911 requirements, as explained below; and (2) the carrier must file, and the Bureau must approve, a compliance plan providing specific information regarding the carrier’s service offerings and outlining the measures the carrier will take to implement the obligations contained in this Order as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary.⁴

Millennium 2000 commits to comply with all conditions set forth in the *Lifeline and Link Up Reform and Modernization Order* related to its provision of Lifeline-only ETC services to customers throughout its service area. Millennium 2000 provides the following Compliance Plan in order to demonstrate the measures it will take in order to comply with the conditions of the *Lifeline and Link Up Reform and Modernization Order*.

I. Millennium 2000 will provide access to 911 and E911 Services in accordance with the Commission’s rules.

A. Access to 911 and E911 Services

Millennium 2000 commits to provide all customers with access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Millennium 2000 handsets, even if the account associated with the handset has no minutes remaining. Thus, such access will continue regardless of the status of the customer’s account. The Company’s existing practices currently provide access to 911 and E911 services to the extent that these services have been deployed by its underlying carrier, Verizon. Millennium 2000 currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended or terminated. Finally, Millennium 2000 agrees to abide by any state-specific obligations to obtain either a

⁴ Id. at ¶368.

certification from each PSAP where it plans to offer service, or a self-certification, confirming that it provides its subscribers with 911 and E911 access.⁵

B. E911 Compliant Handsets

Millennium 2000 commits to provide only E911-compliant handsets to its Lifeline customers. In the event that an existing Lifeline customer does not have an E911-compliant handset, Millennium 2000 commits to replace it with a new 911/E911-compliant handset at no charge to the customer.

II. Millennium 2000 will comply with the terms and conditions of the *Lifeline and Link Up Reform and Modernization Order* related to the Commission's grant of forbearance.

The Commission conditioned its grant of forbearance from the “own-facilities” requirement by requiring each carrier to:

submit to the Bureau for approval a compliance plan that (a) outlines the measures the carrier will take to implement the obligations contained in this Order, including but not limited to the procedures the ETC follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund, materials related to initial and ongoing certifications and sample marketing materials, as well as further safeguards against waste, fraud and abuse the Bureau may deem necessary; and (b) provides a detailed description of how the carrier offers service, the geographic areas in which it offers service, and a description of the carrier's various Lifeline service plan offerings, including subscriber rates, number of minutes included and types of plans available.⁶

A. Procedures for Enrolling a Customer in the Lifeline-Only Program

The *Lifeline and Link Up Reform and Modernization Order* confirmed that the Commission will transition to a governmental database in order to confirm the initial and continued eligibility of a lifeline customer. The Order stated:

As explained above, we conclude that establishing a fully automated means for verifying consumers' initial and ongoing Lifeline eligibility from governmental

⁵ Id. at ¶375.

⁶ Id. at ¶379.

data sources would both improve the accuracy of eligibility determinations and ensure that only eligible consumers receive Lifeline benefits, and reduce burdens on consumers as well as ETCs. . . . We therefore direct the Bureau and USAC to take all necessary actions so that, as soon as possible and no later than the end of 2013, there will be an automated means to determine Lifeline eligibility for, at a minimum, the three most common programs through which consumers qualify for Lifeline.⁷

However, until the database is operational Millennium 2000 proposes to adhere to the following procedures for enrolling a customer into the lifeline program.

Millennium 2000 will implement certification procedures that enable consumers to demonstrate their eligibility for Lifeline assistance by contacting Millennium 2000 in person or via telephone, facsimile, or the internet. At the point of enrollment, consumers will be provided with printed information describing Millennium 2000's Lifeline program, including eligibility requirements, and instructions for enrolling.

Consumers will be enrolled in person or directed to a toll-free telephone number and to Millennium 2000's website, which will contain a link to information regarding the Company's Lifeline service plan, including a detailed description of the program and state-specific eligibility criteria. Millennium 2000's application form for its Lifeline service will identify that it is a "Lifeline" application. Except in states in which applicants are enrolled through a designated state agency, Millennium 2000 will have direct contact with all customers applying for Lifeline service, either in person through its employees, agents or representatives, or via the telephone (including facsimile) or mail. Millennium 2000 will provide Lifeline-specific training to all personnel that interact with actual or prospective consumers, whether employees, agents or representatives, with respect to obtaining, changing or terminating Lifeline services.

Consumers who do not complete the application process in person must return the signed application and support documentation to the Company by mail, fax, email or other electronic

⁷ Id. at ¶403.

transmission. The Company will accept electronic signatures that meet the requirements of the Electronic Signatures in Global and National Commerce Act, 15 USC 7001-7006, and any applicable state laws.⁸ Processing of consumers' applications, including review of all application forms and relevant documentation, will be performed under Millennium 2000's supervision by managers experienced in the administration of the Lifeline program.

Millennium 2000 will ensure that all required documentation is properly handled by using state-specific compliance checklists. For states with program-based eligibility criteria, the form will list each of the qualifying programs, and the applicant will be required to identify the program(s) in which they participate, and to furnish proof that they currently participate in such program(s), regardless of whether such proof is required pursuant to state law. For states with income-based eligibility criteria, the applicant will be required to certify under penalty of perjury that their household income does not exceed the relevant threshold (*e.g.*, 135% of the Federal Poverty Guidelines for federal default states) and will be required to provide proof of income-based eligibility. Pursuant to the *Lifeline and Link Up Reform and Modernization Order*, Millennium 2000 will not retain copies of proof documentation, but rather will maintain accurate records detailing how the consumer demonstrated his or her eligibility.⁹ Millennium 2000 will check the eligibility of low-income consumers seeking to enroll in Lifeline either by accessing electronic eligibility databases, where available, or by reviewing documentation from the consumer demonstrating his/her eligibility for Lifeline service. Where the Company is able to access a state or federal database to make determinations about customer eligibility, the Company is not required to obtain proof documentation; in such case Millennium 2000 or its representative will note in its records what specific data was relied upon to confirm the

⁸ Id. at ¶168.

⁹ Id. at ¶101.

consumer's initial eligibility for Lifeline.¹⁰ To the extent a state agency or third-party administrator is responsible for the initial determination of consumer eligibility, Millennium 2000 will rely on the state identification or database.¹¹

Millennium 2000's Lifeline application form will also include a certification section where the applicant must attest and sign under penalty of perjury that the applicant's representations are true and correct. Pursuant to the *Lifeline and Link Up Reform and Modernization Order* Millennium 2000's certification form will also "explain in plain, easily comprehensible language that: (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; and (4) a household is not permitted to receive Lifeline benefits from multiple providers".¹² Upon enrollment, Millennium 2000 will inform consumers about the annual re-certification requirement on the certification form.¹³ Applicants will also be required to initial a number of disclosure statements intended to ensure that the applicant understands applicable eligibility requirements—including a statement to the effect that to the best of his or her knowledge, the applicant is not receiving Lifeline-supported service from any other Lifeline provider. Penalties for perjury will be clearly-stated on the certification form. The certification form will also contain language stating that violation of the one-per-household requirement constitutes a violation of the Commission's rules and will result in the consumer's de-enrollment from the program, and could result in criminal prosecution by the United States government.¹⁴ Depending on state-specific requirements and/or consultations with relevant state agencies,

¹⁰ See Id. at ¶98.

¹¹ Id.

¹² See Id. at ¶121.

¹³ See Id. at ¶145.

¹⁴ Id. at ¶121.

Millennium 2000 expects the substance of these disclosures to be consistent with the following statements:

By signing below, I certify under penalty of perjury – (additionally, please initial each of the 5 statements below)

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law. _____
2. I understand that Lifeline is only available for one phone line per household, whether landline or wireless. I am the head of household and will only receive Lifeline from Millennium 2000 and no other. _____
3. I do not currently receive Lifeline support from a telephone line serving my residential address or from any other wireless telephone company. No other resident in my household participates in the Lifeline program. _____
4. Furthermore, I certify that I will only use this phone for my family's own use and will not resell it. _____
5. I will notify Millennium 2000 immediately if I no longer qualify for Lifeline, or if I have a question as to whether I would still qualify. _____
6. I agree to cancel any existing Lifeline service with my current provider before I enroll for Lifeline support with Millennium 2000. _____
7. I will notify Millennium 2000 of any change of my address within 30 days of moving by calling 1-866-961-1907. _____

Perjury and false statements are punishable by fines and/or imprisonment.
Signature (required) Date.

In accordance with the *Lifeline and Link Up Reform and Modernization Order*, Millennium 2000 will obtain the consumer's residential address, which the consumer must indicate is his or her permanent address, and a billing address for the service (if the consumer's billing address differs from his or her residential address).¹⁵ A consumer who lacks a permanent residential address must provide a temporary residential service address or other address

¹⁵ Id. at ¶85.

identifying information that could be used to perform a check for duplicative support. For applicants that use a temporary address, Millennium 2000 will attempt to verify every 90 days that the subscriber continues to rely on that address. If the applicant does not respond to address verification attempts within 30 days, the subscriber may be de-enrolled from Lifeline service.¹⁶ The application form will also clearly state that Lifeline participants must provide their new address to the Company within 30 days of moving.¹⁷ Millennium 2000 will incorporate this information into its customer information database. Prior to initiating service for a customer, the Company will check the address of each Lifeline applicant against its database to determine whether or not it is associated with a customer that already receives Millennium 2000 Lifeline service, and will then review the application to ascertain whether the applicant is attempting to receive Lifeline-supported service for more than one handset associated with its household.¹⁸ If the Company determines that an individual at the applicant's residential address is currently receiving Lifeline-supported service, the Company will take an additional step to ensure that the applicant and the current subscriber are part of different households.¹⁹ In order to make this demonstration, Millennium 2000 will require applicants to complete and submit to the Company a written document which will be developed by USAC. Millennium 2000 will deny the Lifeline application of any individual residing at the same address as a current Lifeline subscriber who is part of the same household, and will advise the applicant of the basis for the denial. Finally, prior to requesting a subsidy, Millennium 2000 will process and validate its subsidy data to prevent Duplicate Same-Month Lifeline Subsidies ("Double Dip," *i.e.*, any household that is already receiving a Lifeline subsidy from the Company will be automatically prevented from receiving a

¹⁶ Id. at Appendix C.

¹⁷ Id. at ¶¶85, 117.

¹⁸ Id. at ¶¶29, 74; 47 CFR 54.400(h).

¹⁹ *Lifeline and Link Up Reform and Modernization Order* at ¶78.

second lifeline subsidy in that same month). Millennium 2000 also will immediately de-enroll any subscriber whom the Company knows is receiving Lifeline-supported service from another ETC or knows is no longer eligible.

B. Procedures for Submitting for Reimbursement from USAC

Millennium 2000 will follow the reimbursement procedures outlined in 47 CFR 54.407, including, but not limited to: ensuring that its reimbursement amount for each Lifeline customer equals the federal support amount, including the support amounts described in §54.403(a) and (c); and certifying when it seeks reimbursement from the USAC that it has obtained a valid certification form for each consumer for whom it seeks Lifeline reimbursement.²⁰

C. Procedures for Annually Verifying Eligibility

The *Lifeline and Link Up Reform and Modernization Order* described the initial and annual verification procedures at paragraphs 120-148. Millennium 2000 will require every consumer enrolled in the Lifeline program to verify on an annual basis that he or she receives Lifeline-supported service only from Millennium 2000 and, to the best of his or her knowledge, no one else in the subscriber's household is receiving a Lifeline-supported service.²¹ Any customer that is found to not comply with the rules or that fails to respond to the annual recertification process will be de-enrolled.²²

Pursuant to the new rules, Millennium 2000 will re-certify the eligibility of its Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013. Where ongoing eligibility cannot be determined through access to a qualifying database either by the Company or the state, and there is no state administrator verifying the

²⁰ 47 CFR 54.407; *Lifeline and Link Up Reform and Modernization Order* at ¶¶125-28, Appendix A.

²¹ *Lifeline and Link Up Reform and Modernization Order* at ¶120. A copy of Millennium 2000's Annual Verification Form is included as Exhibit A.

²² *Id.* at ¶122.

continued eligibility of Lifeline subscribers, the Company will re-certify the continued eligibility of all of its subscribers by contacting them—either in person, in writing, by phone, by text message, by email, or otherwise through the Internet—to confirm their continued eligibility.²³ In states where a state agency or a third party has implemented a database that carriers may query to re-certify the consumer’s continued eligibility, the Company (or state agency or third-party, where applicable) will instead query the database and maintain a record of what specific data was used to re-certify eligibility and the date of re-certification.²⁴ The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact Millennium 2000. Millennium 2000 will provide written notice of impending service termination to subscribers who do not respond to the annual re-certification within 30 days. Anyone who does not respond to the impending termination letter within 30 days to demonstrate that his or her Lifeline service should not be terminated will be de-enrolled from the Company’s Lifeline program.²⁵

D. Sample Marketing Materials

Millennium 2000 will market to potential customers through live contact through Millennium 2000 employees and independent contractors, as well as through print and electronic media. Attached to this Compliance Plan as Exhibits B-1 through B-3 are sample Millennium 2000 marketing materials. Exhibit B-1 is a draft Lifeline Application form. Exhibit B-2 is a Lifeline Brochure. Exhibit B-3 is a Lifeline marketing script.

²³ See Id.

²⁴ Id. at ¶131.

²⁵ Id. at ¶¶141-43.

E. Description of how Millennium 2000 will Provide Service.

Millennium 2000 is a non facilities-based provider of resold Commercial Mobile Radio Service (CMRS). The Company will provide prepaid wireless telecommunications services to consumers nationwide by obtaining service, using Verizon Wireless (“Verizon”) as its underlying carrier. Through Verizon, Millennium 2000 has obtained network infrastructure and wireless transmission facilities, which allows Millennium 2000 to provide wireless services to its end-user customers. Millennium 2000 purchases wireless service from its underlying carrier for calling and text messaging and will package those services into Millennium 2000’s service plans and pricing. These calling and texting services will be bundled with Millennium 2000’s handset selection, marketing materials, web interface, and customer service to produce a complete wireless service offering for low-income consumers.

Millennium 2000’s service is provided on a prepaid basis so its customers will not be subject to the credit checks, deposits, contracts, unexpected usage overages, early termination penalties or taxes and surcharges which can sometimes be barriers to service for low income consumers. The prepaid nature of Millennium 2000’s service offerings will enable low income consumers, the very individuals Congress intended to benefit from the Lifeline program, to obtain convenient and affordable wireless services. Millennium 2000’s prepaid wireless services will provide lower-income consumers access to emergency services and a reliable means of communication that can be used to contact potential employers or social service agencies. By marketing and expanding the availability of wireless services to consumers otherwise unable to afford them, and to those who continue to be ignored by traditional carriers, Millennium 2000 will effectively expand access to wireless services. Millennium 2000’s participation in the lifeline program will also increase the number and variety of competitive service providers and

service offerings, which in turn will spur innovation as carriers compete to provide the most attractive service packages to consumers. The increased competition and service offerings align with Congress's intent when it created the universal service program.

F. Geographic Area of Millennium 2000's Service Offerings

Millennium 2000 currently operates as a telecommunications carrier in Illinois and Wisconsin. In Illinois, Millennium 2000 is certificated as a local exchange and interexchange carrier as well as a provider of commercial mobile radio services ("CMRS"). Millennium 2000 was also certified as a wireline ETC in 2008. Millennium 2000 is a certified reseller of local exchange service and it provides landline Lifeline ETC services to customers. Millennium 2000 also provides resold CMRS to Illinois customers. In Wisconsin, Millennium 2000 provides resold CMRS through Verizon, as its underlying carrier. Millennium 2000 recently received its certification as a wireless ETC and expects to begin providing Lifeline services in Wisconsin once its Compliance Plan is approved by the FCC.

Millennium 2000 will seek wireless ETC authority before several states once its Compliance Plan is approved by the FCC.

G. Millennium 2000 Lifeline Plans

Millennium 2000 currently provides wireless services to non-Lifeline customers in Illinois and Wisconsin. Millennium 2000 will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying carrier, Verizon. In addition to free voice services, Millennium 2000's Lifeline plan will include a free handset and the following Custom Calling features at no charge: Caller ID, Call Waiting, and Voicemail. Millennium 2000 does not impose burdensome credit checks or long-term service contracts on its prepaid customers. Customers are not bound by a local calling area requirement; all

Millennium 2000 plans come with domestic long distance at no extra per minute charge and exceptional nationwide digital coverage on the Nationwide Verizon Network. Calls to 911 emergency services are always free, regardless of service activation or availability of minutes.

The tables below contain Millennium 2000's current wireless rates for Non-Lifeline customers and proposed rates to Lifeline customers in Illinois and Wisconsin:

ILLINOIS WIRELESS PLANS

Plans	Lifeline	Non-Lifeline	Minutes	Text
Basic 100	\$10.00	\$20.00	100	Pay Per Usage - .06/text
Extended 100	\$15.00	\$25.00	100	100 SMS
Extended 250	\$20.00	\$30.00	250	250 SMS
Basic 400	\$16.00	\$26.00	400	Pay Per Usage - .06/text
Extended 500	\$30.00	\$40.00	500	500 SMS
Basic 700	\$21.00	\$31.00	700	Pay Per Usage - .06/text

WISCONSIN WIRELESS PLANS

Plans	Lifeline	Non-Lifeline	Minutes	Text
Basic 70	\$10.00	\$20.00	70	Pay Per Usage - .06/text
Extended 100	\$15.00	\$25.00	100	100 SMS
Extended 250	\$20.00	\$30.00	250	250 SMS
Basic 400	\$16.00	\$26.00	400	Pay Per Usage - .06/text
Extended 500	\$30.00	\$40.00	500	500 SMS
Basic 700	\$21.00	\$31.00	700	Pay Per Usage - .06/text

III. Additional Measures to Prevent Waste, Fraud and Abuse

A. Non-Usage Policy

As required by the *Lifeline and Link Up Reform and Modernization Order*, Millennium 2000 will implement a non-usage policy whereby it will de-enroll Lifeline customers that have

not used the Company's Lifeline service for 60 days.²⁶ Millennium 2000 will notify its subscribers upon enrollment about the non-transferability of the phone service, its usage requirements, and the de-enrollment and deactivation that will result following non-usage in any 60-day period of time.²⁷ If no usage appears on a Millennium 2000 Lifeline customer's account during any continuous 60-day period, Millennium 2000 will deactivate Lifeline services for that customer. "An account will be considered active if during any 60-day period the authorized subscriber does at least one of the following: makes a monthly payment; purchases minutes from the ETC to add to an existing pre-paid Lifeline account; completes an outbound call; answers an incoming call from anyone other than the ETC, its representative, or agent; or affirmatively responds to a direct contact from the ETC confirming that he or she wants to continue receiving the Lifeline supported service."²⁸

B. Customer Education with Respect to Duplicates

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, Millennium 2000 will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence, and will help ensure that only eligible consumers enroll in the program and that those consumers are fully informed of the limitations of the program, so as to prevent duplicative or otherwise ineligible service as well as other forms of waste, fraud, and abuse.

²⁶ Id. at ¶¶257-63.

²⁷ Id. at ¶257.

²⁸ Id. at ¶261.

In its marketing materials, including application forms, and in its direct contact with applicants, the Company will emphasize in plain, easily comprehensible language that: (1) Lifeline is a federal benefit; (2) Lifeline service is available for only one line per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; and (4) a household is not permitted to receive Lifeline benefits from multiple providers.²⁹ Millennium 2000 will also include in its marketing materials substantially the following information in clear, easily understood language: the offering is a Lifeline-supported service; that only eligible consumers may enroll in the program; what documentation is necessary for enrollment; and the program is limited to one benefit per household, consisting of either wireline or wireless service.³⁰ Moreover, Millennium 2000 will disclose the company name under which it does business and the details of its Lifeline service offerings.³¹ In order to reinforce the limitation of one Lifeline phone per household, the following statement will appear in the Company's marketing materials and website (www.millennium-2k.com) in a conspicuous place, in bold font and in an offsetting color to ensure it is not overlooked:

Note: By law, the Lifeline program is only available for one phone per household

C. Cooperation with State and Federal Regulators

Millennium 2000 has cooperated and will continue to cooperate with federal and state regulators to prevent waste, fraud and abuse, including:

- Providing state commissions, the FCC or USAC upon request with data that will enable that state, the FCC or USAC to determine whether some consumers are

²⁹ Id. at ¶121.

³⁰ Id. at ¶275.

³¹ Id.

enrolled in more than one Lifeline program. Specifically, the Company agrees to make available state-specific customer data, including name and address, upon request to each state PUC where it operates, the FCC or USAC for the purpose of permitting the PUC, FCC or USAC to determine whether an existing Lifeline customer receives Lifeline service from another carrier, and will participate in such a duplicate resolution process, provided that costs for participation are reasonable or defrayed through the universal service contribution mechanisms;

- Promptly investigating any notification that it receives from a state PUC, the FCC or USAC that one of its customers already receives Lifeline service from another carrier;
- Immediately deactivating a customer's Lifeline service and no longer reporting that customer on USAC Form 497 if the Company's investigation, or if a state, the FCC or USAC concludes that the customer receives Lifeline services from another carrier in violation of the Commission's regulations and that the Company's Lifeline service should be discontinued such as a de-enrollment notification pursuant to the FCC's June 17, 2011 Report and Order (Section III, B.).

IV. Millennium 2000 has the technical and financial capacity to provide Lifeline-Only ETC Services.

Millennium 2000 was certified to conduct business as a reseller and facilities-based provider of local and interexchange telecommunications services in Illinois on June 27, 2007. As described above, Millennium 2000 has obtained network infrastructure and wireless transmission facilities from its underlying carrier, Verizon. In Illinois, Millennium 2000 is currently certified as a local exchange and interexchange carrier and a resold provider of CMRS. Additionally, Millennium 2000 is certified as a wireline ETC for Lifeline services. In Wisconsin, Millennium 2000 is eligible to provide CMRS services and is certificated as a wireless ETC (awaiting authorization from the FCC before it begins offering wireless ETC services). Millennium 2000's directors have the necessary experience to provide Lifeline only ETC services. Donna Harrison is the President of Millennium 2000 Inc. Ms. Harrison has been managing Millennium 2000 Inc., since 2009. Ms. Harrison is a certified Project Management Professional (PMP®) with twenty years of experience in IT and project management, which

includes initiating, planning and executing strategic telecom initiatives. Paris Haynes is a Director for Millennium 2000 Inc. Mr. Haynes has seven years of telecommunication experience, including sales, marketing, advertising of landlines, wireless and satellite services.

Millennium 2000 also has the financial capacity to provide Lifeline only ETC services. Millennium 2000 employs a diverse business strategy in which it provides prepaid wireline and wireless services in Illinois. Millennium 2000 expects to continue to provide these services after it receives Lifeline only ETC authority for wireless services in Illinois. As noted above, Millennium is a certified wireline services ETC in Illinois. Additionally, Millennium 2000 expects to expand its reach over time to other states. Thus, Millennium 2000's business plan is not dependent on any one service or service area.

Dated: March 2, 2012

Respectfully submitted,
Millennium 2000 Inc.

s/ Thomas H. Rowland
By: Thomas H. Rowland

Thomas H. Rowland
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Exhibit A

Millennium 2000, Inc.

2019 W. 95th Street

Chicago, Illinois 60643

Phone: 773-239-0006 • Fax: 773-239-4971

(Insert Date)

Re: Annual Verification of Lifeline Eligibility Survey

Dear Lifeline Customer:

Each year, eligible telecommunication carriers (ETC) are required by the Federal Communications Commission (FCC), to survey Lifeline customers to verify their eligibility to continue to receive lifeline discounted services. **You have been identified as an existing customer that receives federal benefit of discounted Lifeline telephone service with Millennium 2000, Inc.**

In order for you to continue to receive lifeline discounted services, you are required to verify your continued eligibility. Please complete the attached form below and return it to our office **on or before (Insert Date)**. If you do not respond to this eligibility letter request, you will be ruled ineligible to continue to receive lifeline discount services. If you have any questions, please call us at 773-239-0006.

Sincerely,

Millennium 2000, Inc.

Complete the form below and mail to: Millennium 2000, Inc., 2019 W. 95th St. Chicago, IL. 60643

COMPLETE INFORMATION REQUIRED (Please print)

Name _____ Last 4 digits of SSN# _____

Permanent Addr./Apt. # _____ Date of Birth _____

City, State, Zip _____ Home Telephone # _____

I hereby verify my continued participation in a minimum of one of the following programs or that I meet household income eligibility requirements (Select one):

- ☐ Medicaid ☐ Federal Public Housing ☐ National School Lunch Program/Free Lunch
☐ Food Stamps ☐ Supplemental Security Income (SSI) ☐ Unemployment
☐ Low Income Home Energy Assistance Program (LIHEAP)
☐ I certify that my household income is at or below 135% of the federal poverty guideline

By reading and providing your initials below, you agree abide to the rules of the Lifeline Program:

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law.
_____ (initial)

2. I understand that Lifeline is only available for one phone line per household, whether landline or wireless. I am the head of household and will only receive Lifeline from Millennium 2000 and no other Lifeline service provider. _____ (initial)

3. I do not currently receive Lifeline support for a telephone line serving my residential address or for any other wireless telephone company. I attest to the best of my knowledge that no other resident in my household participates in the Lifeline program. _____ (initial)

4. Furthermore, I will only use this phone for my family's own use and will not resell it.
_____ (initial)

5. I will notify Millennium 2000 immediately if I no longer qualify for Lifeline, or if I have a question as to whether I would still qualify. _____ (initial)

6. I agree to cancel any existing Lifeline service with my current provider before I enroll for Lifeline support with Millennium 2000. _____ (initial)

7. I will notify Millennium 2000 of any change of my address within 30 days of moving by calling 1-866-961-1907. _____ (initial)

I authorize MILLENNIUM 2000, Inc. or it's duly appointed representative to access any records required to verify this statement to confirm my continued participation in the above programs. I authorize representatives of the above programs to discuss with and/or provide copies of documentation, if requested by the company, to verify my participation in the above programs and my eligibility for Lifeline services. I affirm, under penalty of perjury, that the foregoing representations are true. Perjury and false statements are punishable by fines and/or imprisonment.

Signature _____

Date _____

Exhibit B-1



Millennium 2000

Providing Affordable Wireless Services

Phone – 1-866-961-1907

Fax – 1-866-961-2881

Lifeline Application Form - Illinois

Applicant Information

Full Name: _____
Last Name First Name Middle Initial

Address: _____
Street Address Apt./Unit #

City: _____
City State Zip Code

The address above is my (check all that applies): ☐ Permanent Residence ☐ Billable Address
☐ Temporary Address*

****If Applicant's address is a temporary living situation Millennium 2000 will attempt to verify every 90 days that the subscriber continues rely on that address. If the Applicant does not respond to the address verification attempts within 30 days, Applicant may be de-enrolled from Lifeline service.**

Lifeline Plan

FREE – 100 Minutes with the following benefits and features included:

FREE – Handset FREE – Voicemail
FREE – Local Calls FREE – National Long Distance
FREE – Nationwide Text FREE – 911*

*Calls to 911 emergency services are always free, regardless of service activation or availability of minutes
Other Lifeline plans are available at a discounted cost. For more information, call 1-866-961-1907.

Qualifying Information

I certify that I participate in at least of the following federally funded programs or that I meet household income eligibility requirements (Select One):

- ☐ Food Stamps ☐ Medicaid ☐ Temporary Assistance for Needy Families (TANF)
- ☐ Low Income Home Energy Assistance Program (LIHEAP) ☐ National Free School Lunch
- ☐ Federal Housing or Section 8 Assistance ☐ Supplemental Security Income (SSI)
- ☐ I certify that my household income is at or below 135% of the federal poverty guideline

You must provide a copy of any current document that proves your participation in one of the programs selected or proof income eligibility. Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return, current income statement from an employer or paycheck stub, a Social Security statement of benefits, a Veterans Administration statement of benefits, a retirement/pension statement of benefits, an Unemployment/Workmen's Compensation statement of benefits, federal or Tribal notice letter of participation in General Assistance, or a divorce decree, child support award, or other official document containing income information. **All documents must have same name and address as provided in this application.**

Household Certification Statement

Lifeline service is a federal benefit provided to eligible consumers. For the purpose of the Lifeline Program, a household is defined as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers.

Please select one of the following statements that apply:

- ☐ I certify that I live at an address that is occupied as a single family household and that I do not currently receive Lifeline support from a telephone line serving my residential address or from any other wireless telephone company. No other person that resides at my address receives Lifeline service from another Lifeline service provider. _____ (initial)
- ☐ I certify that I live at an address occupied by multiple households and that I share an address with other adults who do not contribute income to my household or share in the household's expenses. I do not currently receive Lifeline support from a telephone line serving my residential address or from any other wireless telephone company nor does any other person that resides at my address receive Lifeline service from another Lifeline service provider. _____ (initial)

Certifications and Authorization Statements

PENALTY OF PERJURY

Under title 18 U.S.C. § 1621, whoever willfully states as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.

1. The information contained within this application is true and correct. I acknowledge that providing false or fraudulent documentation is punishable by law. _____ (initial)
2. I certify that I will only use this phone for my family's own use and will not resell it. _____ (initial)
3. I will immediately notify Millennium 2000 if I no longer qualify for Lifeline, or if I have a question as to whether I would still qualify. _____ (initial)
4. I agree to cancel any existing Lifeline service with my current Lifeline provider before I enroll for Lifeline support with Millennium 2000. _____ (initial)
5. I will notify Millennium 2000 of any change of my address within 30 days of moving by calling 1-866-961-1907. _____ (initial)
6. I agree to re-certify my eligibility to participate in the Lifeline Program on an annual basis.

I authorize MILLENNIUM 2000, Inc. or it's duly appointed representative to access any records required to verify these statements to confirm my continued participation in the above program. I authorize representatives of the above programs to discuss with and/or provide copies to my local telephone company, if requested by the company, to verify my participation in the above programs and my eligibility for Lifeline service.

Print Name

Signature

Date

Exhibit B-2



Free Handset and Minutes for Eligible Consumers

Are you in need of affordable
home or wireless telephone
service?

Take a few minutes of your time
to learn about how Millennium
2000 can help assist you with
enrolling in the Lifeline program,
which is a federal benefit that
provides discounted monthly
cellular and home telephone
services to eligible low-income
consumers.

**To enroll in the Lifeline Program,
please call us at 1-866-961-1907**



Millennium 2000

2019 W. 95th Street
Chicago, IL 60643
www.millennium-2k.com

Lifeline Program

*Making Your Connection to
the World Affordable*

Millennium 2000

Tel: 866-961-1907

Understanding the Lifeline Program

Lifeline is a federal program that helps qualified individuals pay for wireless or home telephone service. The federal rules allow you to have a Lifeline discount on one home telephone or one wireless telephone. You may not get Lifeline discounts on two telephones.

Lifeline support lowers the cost of basic, monthly local or wireless telephone service. An eligible customer may receive the Lifeline discount on either a wireline or wireless connection, but the discount is available for only one telephone connection per household. Lifeline does not apply to taxes, surcharges, and mileage charges.

LIFELINE PROGRAM RULES

Lifeline service is a federal benefit provided to eligible consumers. For the purpose of the Lifeline Program, a household is defined as any individual or group of individuals who live together at the same address and share income and expenses. A household is not permitted to receive Lifeline benefits from multiple providers. If you or anyone in your household currently has Lifeline support, you must agree to cancel any existing Lifeline service with your current Lifeline service provider before you enroll for Lifeline support with Millennium 2000. **Note: By law, the Lifeline program is only available for one phone per household.**

Other lifeline rules states that non-usage of a wireless handset for a consecutive 60 days will result in de-enrollment of the Lifeline program.

ELIGIBILITY REQUIREMENTS

Only individual receiving certain government assistance qualifies for the Lifeline program. Eligibility guidelines vary by state.

In general, if you participate in a public assistance program such as Food Stamps, Medicaid, Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), Low Income Home Energy Assistance Program (LIHEAP), National Free School Lunch, Federal Housing/Section 8 Assistance, you can qualify for the program.

If you do not receive any of these public assistance programs, you may still qualify for Lifeline support if your household gross monthly income is at or below 135% of the federal poverty guideline.

PROOF OF ELIGIBILITY

You must provide a copy of any current document that proves your participation in one of the programs selected or proof income eligibility. Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return, current income statement from an employer or paycheck stub, a Social Security statement of benefits, a Veterans Administration

statement of benefits, a retirement/pension statement of benefits, an Unemployment/Workmen's Compensation statement of benefits, federal or Tribal notice letter of participation in General Assistance, or a divorce decree, child support award, or other official document containing income information. **All documents must have same name and address as provided in this application. Under title 18 U.S.C. § 1621, whoever willfully states as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both.**

ANNUAL CERTIFICATION AND VERIFICATION

Once you are enrolled in the Lifeline Program, after the initial year, you must verify annually that you are qualified for continued enrollment in the Lifeline Program. Furthermore, you must certify that no other person in your household is receiving Lifeline services. If you fail to re-certify your eligibility, you will be de-enrolled from the Lifeline program. This means you will no longer receive the free monthly minutes or discounted home phone or wireless services. If you should become ineligible for Lifeline enrollment, you must immediately notify Millennium 2000 that you no longer meet the eligibility requirements for enrollment by calling us at 1-866-961-1907.

Exhibit B-3

LIFELINE SCRIPT

Hello, my name is (your name), from Millennium 2000, how are you today?

I would like to take a few minutes of your time to inform you about the Lifeline program, which provides discounted monthly cellular and home telephone services to eligible low-income consumers.

Do you receive any government assistance?

Do you have a few minutes to learn about how the Lifeline program can help you reduce the costs of your cell phone services?

Millennium 2000 offers a free cell phone with an hour and forty minutes of talk time to eligible Lifeline applicants. The services come with call waiting, caller id, voicemail and at no additional charge.

Don't worry if you go over your free minutes, you can purchase additional minutes at a low affordable rate if you qualify as an eligible Lifeline customer. We have rates as low as \$1 for an additional 10 minutes for Lifeline customers only.

Calls to 911 emergency services are always free, regardless of service activation or availability of minutes. This means that as long as your cell phone powers up, you will be able to call 911 if you need to.

Only individuals receiving certain government assistance qualify for the program. Eligibility guidelines vary by state.

In general, if you participate in a public assistance program such as Food Stamps, Medicaid, Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), Low Income Home Energy Assistance Program (LIHEAP), National Free School Lunch, Federal Housing/Section 8 Assistance, you can qualify for the program. If you do not receive any of these public assistance programs, you may still qualify based on total household gross monthly income.

Which government assistance program do you receive?

Lifeline is a non-transferable federal benefit that is only available to one consumer per household. This means that you may not transfer this benefit to any other person.

In addition, you and no one else in your household may receive more than one Lifeline service at your address.

If you are currently receiving Lifeline from another provider and you wish to receive your Lifeline support from Millennium 2000, you must cancel your Lifeline support with

your current service provider before you enroll your Lifeline service with Millennium 2000.

Violation of one Lifeline service per household limitation constitutes a violation of the rules of the program and will result in fines, imprisonment, de-enrollment or being barred from the Lifeline program.

By filling out an application, we will start your process to confirm your eligibility for approval to receive Lifeline benefits.

This program is designed to help you, not hurt you so there is no need to worry about credit checks, deposits or down payments.

Once you are enrolled in the Lifeline Program, you will be qualified to participate for up to 1 year. If you have a change in address, you must immediately notify Millennium 2000.

To continue in the Lifeline Program, after the initial year, you must verify annually that you are qualified for continued enrollment in the Lifeline Program. You must further attest to the best of your knowledge that no other person in your household is receiving Lifeline services.

We will obtain annual certifications through a written letter, an Interactive Voice Response system, or a text message.

If you fail to re-certify your eligibility, you will be de-enrolled from the Lifeline program. This means you will no longer receive the free monthly minutes or discounted home phone or wireless services.

If you should become ineligible for Lifeline enrollment, you must immediately notify Millennium 2000 Wireless that you no longer meet the eligibility requirements for enrollment by calling 1-866-961-1907.

Are you interested in completing a Lifeline application, which will allow you to receive discounted cellular or home phone services?

Thank you for your time. If you want more information about Millennium 2000 and the Lifeline Program, visit our website at www.millennium-2k.com.

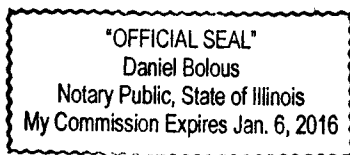
In the meantime, please take this handout, which explains more information about the Lifeline program. If you have any questions, please remember you can always call us at 866-961-1907.


STATE OF ILLINOIS)

COUNTY OF COOK)

Verification

I, Donna Harrison, being first duly sworn, depose and state that I am President of Millennium 2000 Inc. and that I have read the foregoing and know the contents thereof and the statements therein contained are true, to the best of my knowledge, information and belief.




Donna Harrison

Millennium 2000 Inc.

Subscribed and Sworn
to before me this 2nd
day of March 2012.

